

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Qwest Communications)	WC Docket No. _____
International Inc.)	
)	
Consolidated Application for Authority)	
to Provide In-Region, InterLATA Services in)	
Montana, Utah, Washington and Wyoming)	

ATTACHMENT 1

REQUIRED STATEMENTS

Pursuant to the Commission's March 23, 2001 Public Notice, "Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act," Qwest states as follows:

- (a) pages i - iii of this Brief contain a table of contents;
- (b) pages 2 - 5 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 12 - 18 of this Brief contain a statement identifying how Qwest meets the requirements of section 271(c)(1); the table of contents of Appendix L identifies all of the interconnection agreements that Qwest has entered into pursuant to negotiations and/or arbitrations under section 252; Attachment 3 to this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 5 - 12 of this Brief contain a statement summarizing the status and findings of the Montana Public Service Commission, the Public Service Commission of Utah, the Washington Utilities and Transportation Commission and the Wyoming Public Service Commission proceedings examining Qwest's compliance with Section 271;

- (e) this Brief contains the legal and factual arguments outlining how the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 18 - 159 address the requirements of section 271(d)(3)(A); pages 169 - 176 address the requirements of section 271(d)(3)(B); and pages 176 - 192 address the requirements of section 271(d)(3)(C);
- (f) Attachment 5 (separately bound) contain a list of all appendices (including declarations) and the location of and subjects covered by each of those appendices;
- (g) inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by Qwest in this joint application should be addressed to:

C. Jeffrey Tibbels
Hogan & Hartson L.L.P.
Columbia Square
555-13th Street NW
Washington, D.C. 20004
202-637-6968
cjtibbels@hhlaw.com

- (h) an Anti-Drug Abuse Act certification as required by 47 C.F.R. § 1.2002 is included as Attachment 2; and
- (i) a certification signed by an officer or duly authorized employee certifying that all information supplied in this joint application is true and accurate to the best of his or her information and belief is included as Attachment 2.

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Montana, Utah, Washington, Wyoming)	

ATTACHMENT 2

**Before the
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In the Matter of)
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Qwest Communications) **WC Docket No. _____**
International Inc.)
)
Consolidated Application for Authority)
to Provide In-Region, InterLATA Services in)
Montana, Utah, Washington and Wyoming)

DECLARATION AND VERIFICATION OF R. STEVEN DAVIS

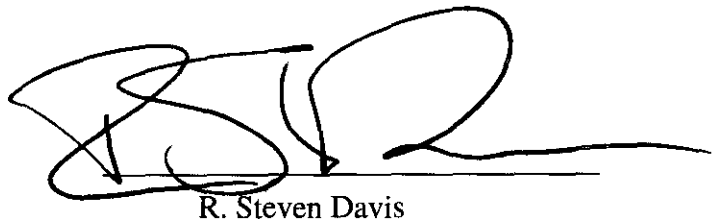
1. I am Senior Vice President, Deputy General Counsel and Assistant Secretary of Qwest Communications International Inc. ("QCII"). I am authorized to make this Declaration on behalf of QCI and its subsidiaries, Qwest Corporation and Qwest Communications Corporation (collectively, and together with QCII, "Qwest"), that are parties to the captioned Consolidated Application.

2. I have reviewed the foregoing Consolidated Application for Provision of In-Region, InterLATA Services in Montana, Utah, Washington and Wyoming and the materials filed in support thereof.

3. The information contained in the Consolidated Application has been provided by persons with knowledge thereof. All information supplied in the Consolidated Application is true and accurate to the best of my knowledge, information and belief formed after reasonable inquiry.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2002.


R. Steven Davis

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)

**Qwest Communications
International Inc.**)

WC Docket No. _____

Consolidated Application for Authority)
to Provide In-Region, InterLATA Services in)
Montana, Utah, Washington and Wyoming)

**ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION OF
QWEST COMMUNICATIONS INTERNATIONAL, INC.**

1. I am Vice President – Risk Management of Qwest Services Corporation (“QSC”).

I am authorized to make this Declaration on behalf of Qwest Communications International Inc. (“QCII”) and its subsidiaries, Qwest Corporation and Qwest Communications Corporation (collectively, and together with QCII and QSC, “Qwest”), that are parties to the captioned Consolidated Application.

2. I hereby certify that Qwest is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

3. I declare under penalty of perjury that the forgoing is true and correct.

Executed on July 5, 2002.



David J. Heller

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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Qwest Communications)	WC Docket No. _____
International Inc.)	
)	
Consolidated Application for Authority)	
to Provide In-Region, InterLATA Services in)	
Montana, Utah, Washington and Wyoming)	

ATTACHMENT 3

FEDERAL COURT CHALLENGES UNDER 47 U.S.C. § 252(E)(6)

The following cases represent the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements approved by the Montana Public Service Commission, the Public Service Commission of Utah, the Washington Utilities and Transportation Commission and the Public Service Commission of Wyoming:

Montana

None

Utah

1. *U S WEST Communications, Inc. v. Mecham, et. al.*, No. 98-CV-490 (D. Utah). On July 9, 1998, the former U S WEST Communications, Inc. filed a petition for judicial review of the Public Service Commission of Utah's orders relating to interconnection agreements with AT&T Communications of the Mountain States, Inc., and MCI Metro Access Transmission Services, Inc. Also on July 9, 1998, MCI filed its own petition against U S WEST, the individual Commissioners and the Commission (Docket No. 98-CV-488). The two cases were consolidated under Docket No. 98-CV-488. On September 20, 1999, the

District Court denied the Commission's motion to dismiss both cases based on the Eleventh Amendment to the United States Constitution. The Commission took an interlocutory appeal to the United States Court of Appeals for the Tenth Circuit, which affirmed the District Court on June 20, 2000. The United States Supreme Court denied the Commission's petition for a writ of certiorari on February 20, 2001. The cases remain pending before the District Court.

2. *U S WEST Communications, Inc. v. Nextlink Utah, Inc., et. al.*, No. 2:00:CV-13 (D. Utah). On January 6, 2000, the former U S WEST Communications, Inc. filed a petition for judicial review of the Public Service Commission of Utah's orders relating to reciprocal compensation for Internet-bound traffic under an interconnection agreement with Nextlink Utah, Inc. Qwest Corporation (which succeeded to U S WEST Communications, Inc.), Nextlink and the Commission filed briefs. The matter remains pending.

Washington

None

Wyoming

None

ATTACHMENT 4

INDEX TO ELECTRONIC DOCUMENTS

Qwest's Application for the provision of In-Region, InterLATA Services in Montana, Utah, Washington and Wyoming consists of a Brief and Attachments 1-5. The bulk of the material in the Application is located in a series of Appendices contained in Attachment 5. Those Appendices include:

- Appendix A Contains thirty five Declarations from Qwest employees which provide information on 1) The 271 workshop process in Montana, Utah, Washington and Wyoming; 2) Qwest's compliance with each of the fourteen checklist items, including a review of the extensive ROC OSS Third Party Test; 3) Qwest's compliance with Section 272 of the Act, 3) Qwest's satisfaction of the Public Interest and Track A requirements; 4) Qwest's pricing of Unbundled Network Elements, Interconnection and Resold Services in conformance with the Act, and 5) An overview of Qwest's Performance Results.
- Appendix B Contains the Statement of General Terms and Conditions for the states of Montana, Utah, Washington and Wyoming.
- Appendix C Contains the various Reports and Orders from the state regulatory agencies of Montana, Utah, Washington and Wyoming relating to the 271 and Cost Docket Proceedings in each state. Appendix C also contains the various reports of the Facilitator of the Multistate Workshops and the Reports and Orders from the Colorado Cost Dockets.
- Appendix D Contains the Qwest Commercial Performance Results for the states of Montana, Utah, Washington and Wyoming, as well as regional results for the fourteen state Qwest region.
- Appendix E Contains the Qwest Performance Assurance Plans for the states of Montana, Utah, Washington and Wyoming.
- Appendix F Contains the Third Party Test Reports from the Region-wide, ROC Third Party Test as well as the Final Report of the Cap Gemini Third Party Test for the state of Arizona.
- Appendix G Contains the record of ROC Third Party Test Proceedings.

- Appendix H Contains the record of the ROC Post Entry Performance Plan Workshops, which included the participation of the Montana, Utah, Washington and Wyoming state regulatory agencies, as well as other states in the in the Qwest region.
- Appendix I Contains the record of cost docket proceedings in the states of Colorado, Montana, Utah, Washington and Wyoming.
- Appendix J Contains the record of the proceedings that considered the formal SGAT filings of Qwest in the states of Montana, Utah, Washington and Wyoming. The states of Washington and Wyoming considered the SGAT in the 271 proceeding. The record of these proceedings is included in Appendix K, Record of the 271 Proceedings.
- Appendix K Contains the record of the 271 Proceedings in Montana, Utah, Washington and Wyoming. Because the states of Montana, Utah, Washington and Wyoming participated in the Multistate workshops, the record of those workshops is included in the record for each of these states.
- Appendix L Contains the Interconnection Agreements, including wireline, wireless, resale and paging, for the states of Montana, Utah, Washington and Wyoming.
- Appendix M Contains the record of the Arbitration Proceedings in the states of Montana, Utah, Washington and Wyoming.
- Appendix N Contains the record of Miscellaneous Wholesale dockets in the states of Montana, Utah, Washington and Wyoming
- Appendix O Contains the Qwest Change Management Process Notifications
- Appendix P Generally contains those documents that were filed in the states of Montana, Utah, Washington and Wyoming after June 4, 2002.

The material in Qwest's Application contains documents that are provided in three formats – paper, Compact Discs ("CD"), and the web. Not all documents are provided in all formats. The following table shows whether a particular Attachment or Appendix of the Application is provided on paper, CD or the web:

	Description	Paper	CD	Web
	Brief	Yes	Yes	Yes
Attachment 1	List of Required Statements	Yes	Yes	Yes
Attachment 2	Affidavits of Qwest Officers	Yes	Yes	Yes
Attachment 3	Federal Court Challenges	Yes	Yes	Yes
Attachment 4	Index to Electronic Documents	Yes	Yes	Yes
Attachment 5	Appendices to Application			
	Table of Contents	Yes	Yes	Yes
Appendix A	Affidavits and Exhibits	Yes	Yes	Yes
Appendix B	SGATs	Yes	Yes	Yes
Appendix C	State Regulatory Agency Orders and Reports	Yes	Yes	No
Appendix D	Commercial Performance Results	Yes	Yes	Yes
Appendix E	Qwest Performance Assurance Plans	Yes	Yes	Yes
Appendix F	Third Party Test Reports	Yes	Yes	Yes
Appendix G	ROC Third Party Test Record	No	Yes	No
Appendix H	ROC PEPP Workshop Record	No	Yes	No
Appendix I	State Cost Docket Records	No	Yes	No
Appendix J	SGAT Proceedings Records	No	Yes	No
Appendix K	271 Proceeding Records	No	Yes	No
Appendix L	Interconnection Agreements	No	Yes	No
Appendix M	Record of Arbitration Proceedings	No	Yes	No
Appendix N	Misc. Wholesale Proceedings	No	Yes	No
Appendix O	Change Management Process	No	Yes	No
Appendix P	Recent Documents	No	Yes	No

The files on the Compact Discs are organized in accordance with the Application's Table of Contents. The Table of Contents is included at the beginning of Attachment 5 of the Application. The following steps can locate any document in the Application:

Step 1 – Use the Index to the Table of Contents -- To locate a document within the Application, turn to the Table of Contents. The documents in the Table of Contents are organized by Appendix, as described above. Many of the Appendices are further divided by state,

and in some cases, are further divided by volume. For example, there are separate sections of Appendix M (Record of Arbitration Proceedings) for the states of Montana, Utah, Washington and Wyoming. Within each state arbitration section, there are several volumes – each volume corresponding to a particular arbitration proceeding in that state.

Due to the size of the Table of Contents, the first few pages of the Table of Contents contain an Index. For example, to find a document within the Washington 271 proceeding, the Index shows that there is one volume for the Washington Appendix K. The Index to the Table of Contents shows the detailed Table of Contents for this Volume begins on page 486. This page of the Table of Contents begins a listing, in chronological order, of all the documents in this proceeding. A portion of this Table of Contents appears below:

**Appendix K – Record of the 271 Proceeding
Washington**

Vol.	Tab	Date	Description
1	11	02/28/97	AT&T's Reply Comments
1	12	02/28/97	Reply Comments of ELI
1	13	02/28/97	Reply Comments of MFS

Step 3 -- Use the Table of Contents to Identify a Document – Using the above Table of Contents as an example, the February 28, 1997 Reply Comments of ELI is located in Appendix K – Washington, Volume 1, Tab 12.

Step 4 -- Identifying the Compact Disc – With the above information in hand, the next step is to locate the particular CD upon which the document is located. Qwest's Application consists of over 22,000 documents which are located on over 50 CDs. These CDs are provided in a notebook, with each CD placed in a sleeve, with four sleeves on each page of the notebook. Each Sleeve is labeled with a Page Number and Sleeve Number. For example, the first sleeve in

the CD Notebook is labeled "Page 1, Sleeve A", the second "Page 1, Sleeve B", the third "Page 1, Sleeve C" and the fourth "Page 1, Sleeve D". To locate the specific CD that contains a particular document in the index, turn to Exhibit A of this Attachment 4. Exhibit A shows the contents and location of each of the CDs provided in this Application. The index indicates that the above document is located on the CD located in Page 6, Sleeve C.

Step 5 – Finding the Document on the Compact Disc – Once the proper CD has been identified and loaded on a computer, the proper file can be identified using the unique file structure for all documents. All individual documents use the following file naming convention:

(State)(Appendix)(Volume)(Tab)

Again, using the example document, located in Appendix K – Washington, Volume 1, Tab 12, would have a file name of:

WA_K_1_0120

Where:

- WA Represents the state of Washington;
- K Represents the Appendix K
- 1 Represents the Volume Number
- 0120 Represents the tab number. All files have a four or five digit tab number to ensure their proper sequencing on the CD:

For tabs in the range 1-9, the structure is 00X0, where X is the tab number. The last digit is reserved for decimal tabs (i.e., tab X.Y) in which case the file name would be 00XY;

For tabs in the range 10-99, the structure is 0XX0, where XX is the tab number. The last digit is reserved for decimal tabs (i.e., tab XX.Y) in which case the file name would be 0XXY;

For tabs in the range 100-999, the structure is XXX0, where XXX is the tab number. The last digit is reserved

for decimal tabs (i.e., tab X.Y) in which case the file name would be XXXY;

And tabs in the range 1000-9999 the structure is XXXX0 where XXXX is the tab number. The last digit is reserved for decimal tabs (i.e., tab X.Y) in which case the file name would be XXXXY.

Simply locate the file on the CD that corresponds with the appropriate State, Volume, and Tab number, and open the file to review.

Confidential Documents – The record of the various proceedings that have been included in this Application include the confidential and proprietary information of Qwest and third parties. In accordance with the FCC's instructions, Qwest has provided redacted versions of these materials in its Application. Also in accordance with the instructions of the FCC, copies of the non-redacted Qwest material have been provided as a part of this Application in a separate confidential section.

Formerly Confidential Documents – The record of the various proceeding included in this Application include certain documents that were originally submitted by Qwest (or its predecessor, U S WEST) as confidential or proprietary documents. As time has passed, many of these Qwest/U S WEST documents are no longer considered confidential by Qwest. As a result, previously confidential or proprietary Qwest/U S WEST documents that are no longer considered confidential/proprietary have been included in their original non-redacted version with the "Confidential" or "Proprietary" stamp just as they appeared in the original record of the state proceeding. All Qwest documents that are still considered confidential or proprietary material have been redacted and treated in accordance with the preceding paragraph.

Exhibit A

Appendix	Page	Sleeve
Brief	1	A
Attachment 1 – List of Required Statements	1	A
Attachment 2 – Declaration of Qwest Officer	1	A
Attachment 3 – Federal Court Challenges under 47 U.S.C. § 252(e)(6)	1	A
Attachment 4 – Index to Electronic Files	1	A
Attachment 5 – Appendices to Application		
Table of Contents	1	A
Appendix A – Declarations	1	A
Appendix B – Statement of Generally Available Terms and Conditions	1	B
Appendix C – State Regulatory Agency Reports and Orders	1	B
Appendix D – Commercial Performance Results	1	B
Appendix E – Qwest Performance Assurance Plans	1	B
Appendix F – ROC Third Party Test Report	1	B
Appendix G – ROC OSS Third Party Test Record		
Administrative (Vol. 1)	1	C
Project Management (Vol. 2)	1	C
Technical Advisory Group (Vol. 3)	1	C
Master Test Plan (Vol. 4)	1	C
Test Requirement Document	1	C
Drafts of MTP	1	C
Performance Measures	1	C
November 2000 Performance Measures Data	1	C
PID Releases	1	C
Test Execution	1	C
Observations	1	C
Exceptions	1	C
Master Test Plan Change Requests	1	C
HP Interim Report	1	C
KPMG Interim Report	1	C
Discrete Test Reports	1	D
Observations and Exceptions Summary Logs	1	D
Vendor Technical Conference	1	D

Exhibit A

Appendix	Page	Sleeve
FCC and DOJ Briefing Presentations	1	D
KPMG Draft Final Report	1	D
EB-TA Process Report	1	D
Appendix H – ROC Post Entry Performance Plan Workshops	2	A
Appendix I – Cost Dockets – Colorado		
Interim Tariff (Vol. 1)	2	B
Permanent Rates (Vol. 2) (tabs 1–248)	2	B
Permanent Rates (Vol. 2) (tabs 249–391)	2	C
SGAT Rates (Vol. 3)	2	C
Appendix I – Cost Dockets – Montana	2	D
Appendix I – Cost Dockets – Utah		
Phase I , Phase II, and Phase III (Vol. 1 through 3b)	3	A
Resale Discount Rates (Vol. 4)	3	B
Collocation (Vol. 5)	3	B
Wholesale Pricing (Vol. 6)	3	B
Docket No. 01-049-85 (Vol. 7)	3	B
Appendix I – Cost Dockets – Washington		
Volume 1 (tabs 1 – 358)	3	C
Volume 1 (tabs 359 – 805)	3	D
Volumes 2 and 3	4	A
Appendix I – Cost Dockets – Wyoming	4	B
Appendix J – SGAT Proceeding		
Montana	4	C
Utah	4	D
Washington (See Appendix K)	N/A	N/A
Wyoming (See Appendix K)	N/A	N/A
Appendix K – Record of the 271 Proceeding – Montana		
271 Proceeding (Vol. 1) (tabs 1-355)	5	A
271 Proceeding (Vol. 1) (tabs 356 - 1027)	5	B
271 Proceeding (Vol. 1) (1028 - 1090)	5	C
Appendix K – Record of the 271 Proceeding – Utah		
271 Proceeding (Vol. 1) (tabs 1 - 499)	5	D
271 Proceeding (Vol. 1) (tabs 500 - 999)	6	A

Exhibit A

Appendix	Page	Sleeve
271 Proceeding (Vol. 1) (tabs 1000 - 1151)	6	B
Appendix K – Record of the 271 Proceeding – Washington		
271 Proceeding (Vol. 1) (tabs 1-500)	6	C
271 Proceeding (Vol. 1) (tabs 501-999)	6	D
271 Proceeding (Vol. 1) (tabs 1000 – 1377))	7	A
271 Proceeding (Vol. 1) (1378 - 1808)	7	B
Appendix K – Record of the 271 Proceeding – Wyoming		
271 Proceeding (Vol. 1) (tabs 1–536)	7	C
271 Proceeding (Vol. 1) (tabs 537 - 936)	7	D
271 Proceeding (Vol. 1) (tabs 937 - 1212)	8	A
271 Proceeding (Vol. 1) (tabs 1213 - 1408)	8	B
Appendix L – Interconnection Agreements		
Montana	8	C
Utah	8	D
Washington	9	A
Wyoming	9	B
Appendix M – Arbitration Proceedings – Montana		
Volumes 1, Volume 2 (tab 1 – 120)	9	C
Volume 2 (tabs 121 - 201), Volumes 3 - 5	9	D
Appendix M - Arbitration Proceedings – Utah		
Volumes 1 - 5	10	A
Volumes 6a – 7f	10	B
Appendix M – Arbitration Proceedings – Washington		
Volume 1	10	C
Volumes 2 and 3	10	D
Volumes 4 - 6	11	A
Volume 7	11	B
Volume 8	11	C
Volume 9	11	D
Volume 10	12	A
Volume 11	12	B
Appendix M - Arbitration Proceedings - Wyoming		
Volume 1 (tabs 1 – 85)	12	C

Exhibit A

Appendix	Page	Sleeve
Volume 2 (tabs 86 – 173) and Volume 2	12	D
Appendix N – Miscellaneous Wholesale Dockets		
Montana	13	A
Utah	13	B
Washington	13	C
Wyoming (See Appendix P)	N/A	N/A
Appendix O – Change Management Process (CMP)	13	D
Appendix P – Recent Documents	14	A

This page has been substituted for one of the following:

- The actual document, page(s) or materials may be reviewed (**EXCLUDING CONFIDENTIAL DOCUMENTS**) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

Box 1	Table of Contents	Books 1-3	Brief
Box 2	Appendix A	Books 1-11	
Box 3	Appendix A	Books 12-21	
Box 4	Appendix B	Montana Books 1&2	
		Utah Books 1&2	
		Washington Books 1&2	
		Wyoming Books 1&2	
	Appendix C	Colorado Books 1&2	
Box 5	Appendix C	Montana Books 1-5	
		Washington Books 1-6	
		Wyoming Books 1&2	
Box 6	Appendix C	Utah Books 1-5	
		Multi-State Books 1-4	
	Appendix D	Books 1-2 of 17	
Box 7	Appendix D	Books 3 through 13 of 17	
Box 8	Appendix D	Books 14 through 17 of 17	
	Appendix E	Book 1 of 1	
	Appendix F	Books 1-6	
53 compact disks			